UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated:

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 9790 (SHS)

NOTICE OF MOTION TO ADMIT LYNN LINCOLN SARKO PRO HAC VICE



Civil Action No: 07 Civ. 10294

ANTON RAPPOLD, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 10396

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN: and JANE DOES 1 - 10,

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

STEPHAN FIORINO, individually and on : behalf of all others similarly situated, :

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

_____X

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10458

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR

Plaintiff.

PUERTO RICO, and all others similarly,

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH: RODIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, SANFORD I. WEILL,

Defendants.

ALAN STEVENS, on Behalf of Himself and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, PETER JOHNSON, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, FRANKLIN A. THOMAS, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., THE INVESTMENT COMMITTEE and JOHN DOES 1-30,

Defendants.

STEPHEN GOLDSTEIN, on Behalf of Himself and a Class of Persons Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., THE PLANS

ADMINISTRATION COMMITTEE OF

CITIGROUP, INC., MICHAEL E.

SCHLEIN, CHARLES PRINCE, C.

MICHAEL ARMSTRONG, ALAIN J.P.

BELDA, GEORGE DAVID, KENNETH T.:

DERR, JOHN M. DEUTCH, ROBERTO

HERNANDEZ RAMIREZ, ANDREW N.

LIVERIS, ANNE MULCAHEY,

RICHARD D. PARSONS, JUDITH

RODIN, ROBERT E. RUBIN, ROBERT L.:

RYAN, AND FRANKLIN A. THOMAS,

And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11156

Page 5 of 37

CHRIS SOUTHARD, on Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

FRANCIA BRICK, individually and on Behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLAN'S ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE,: And JOHN DOES 1-10,

Defendants.

Civil Action No: 07 Civ. 11164

WILLIAM and PATRICIA WOODWARD,: individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CITIGROUP INC., CHARLES PRINCE, ROBERT E. RUBIN, C. MICHAEL ARMSTRONG, ALAIN J. P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANN MULCAHEY, RICHARD: D. PARSONS, JUDITH RODIN, ROBERT: L. RYAN, FRANKLIN A. THOMAS, ANN: DIBBLE JORDAN, KLAUS KLEINFELD: AND DUDLEY C. MECUM, and JOHN and JANE DOES 1-10,

Civil Action No: 07cv11207

Defendants.

NOTICE OF MOTION TO ADMIT LYNN LINCOLN SARKO PRO HAC VICE

PLEASE TAKE NOTICE that upon the annexed Declaration of Lynda J. Grant, the Affidavit of Lynn Lincoln Sarko and the Certificate of Good Standing annexed thereto, the undersigned will move this Court, before the Honorable Sidney H. Stein on a date to be determined by the Court, in the United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007, for an Order (attached hereto), pursuant to Rule

1.3(c) of the Local Rules of the United States District Courts for the Southern District and Eastern Districts of New York, admitting Lynn Lincoln Sarko *pro hac vice*.

Dated: January 15, 2008

Respectfully submitted,

Lynda J. Grant (L

OHEN, MILSTEIN, HAUSFELD

& TOLL, P.L.L.C.

150 East 52nd Street, 30th Floor New York, New York 10022

(212) 838-7797

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated, Civil Action No: 07 Civ. 9790 (SH\$) Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants. SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated, Civil Action No: 07 Civ. 10294 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10, Defendants. MEREDITH TRANBERG, individually and on behalf of all others similarly situated: Civil Action No: 07 Civ. 10341 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

ANTON RAPPOLD, individually and on

Plaintiff,

behalf of all others similarly situated,

Civil Action No: 07 Civ. 10396

v.

CITIGROUP INC., CITIBANK, N.A., : CHARLES PRINCE, THE PLANS : ADMINISTRATIVE COMMITTEE OF : CITIGROUP INC., THE 401(k) : INVESTMENT COMMITTEE, and JOHN : and JANE DOES 1 - 10, :

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff, : Civil Action No: 07 Civ. 10442

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

STEPHAN FIORINO, individually and on : behalf of all others similarly situated,

Plaintiff,

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

_____X

Plaintiff,

v.

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10458

----X

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR: PUERTO RICO, and all others similarly,

Plaintiff,

Civil Action No: 07 Civ. 10472

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN **INVESTMENT COMMITTEE and JOHN** DOES 10-20, C. MICHAEL ARMSTRONG, ALAN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH: RODIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, SANFORD I. WEILL,

Defendants.

ALAN STEVENS, on Behalf of Himself and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, PETER JOHNSON, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, FRANKLIN A. THOMAS, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., THE INVESTMENT COMMITTEE and JOHN DOES 1-30,

Defendants.

STEPHEN GOLDSTEIN, on Behalf of Himself and a Class of Persons Similarly Situated,

Plaintiff,

٧.

CITIGROUP INC., THE PLANS
ADMINISTRATION COMMITTEE OF
CITIGROUP, INC., MICHAEL E.
SCHLEIN, CHARLES PRINCE, C.
MICHAEL ARMSTRONG, ALAIN J.P.
BELDA, GEORGE DAVID, KENNETH T.:
DERR, JOHN M. DEUTCH, ROBERTO
HERNANDEZ RAMIREZ, ANDREW N.
LIVERIS, ANNE MULCAHEY,
RICHARD D. PARSONS, JUDITH
RODIN, ROBERT E. RUBIN, ROBERT L.:
RYAN, AND FRANKLIN A. THOMAS,
And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11156

CHRIS SOUTHARD, on Behalf of All

Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 11164

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

FRANCIA BRICK, individually and on Behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLAN'S ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE,: And JOHN DOES 1-10,

Defendants.

-----X WILLIAM and PATRICIA WOODWARD,: individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

Civil Action No: 07cv11207

v.

CITIGROUP INC., CHARLES PRINCE, ROBERT E. RUBIN, C. MICHAEL ARMSTRONG, ALAIN J. P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANN MULCAHEY, RICHARD: D. PARSONS, JUDITH RODIN, ROBERT: L. RYAN, FRANKLIN A. THOMAS, ANN: DIBBLE JORDAN, KLAUS KLEINFELD: AND DUDLEY C. MECUM, and JOHN and JANE DOES 1-10,

Defendants.

DECLARATION OF LYNDA J. GRANT IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

I, Lynda J. Grant, hereby declare as follows:

- I am an attorney admitted to practice in the State of New York, and in the 1. Southern and Eastern Districts of New York. I submit this Declaration in support of the motion to admit Lynn Lincoln Sarko to the United States District Court for the Southern District of New York pro hac vice for purposes of this action.
- I agree to act as local counsel for Lynn Lincoln Sarko and to observe the 2. Rules of this Court governing the conduct of attorneys.
- Lynn Lincoln Sarko is a member in good standing of the Bar of the State 3. of Washington.

For the foregoing reasons, it is respectfully requested that Lynn Lincoln Sarko be admitted *pro hac vice* to the United States District Court for the Southern District of New York for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2008

Respectfully submitted,

ynda J. Grant (LG-478

COHEN, MILSTÆIN, HAJUS

Page 16 of 37

& TOLL, P.L.L.C.

150 East 52nd Street, 30th Floor New York, New York 10022

(212) 838-7797

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WILLIAM AND PATRICIA WOODWARD,)
Individually and On Behalf of All Others)
Similarly Situated	Case No. 07-cv-11207
Plaintiffs,	
vs.)
) <u>CLASS ACTION</u>
CITIGROUP, INC., CHARLES PRINCE,)
ROBERT E. RUBIN, C. MICHAEL	
ARMSTRONG, ALAIN J.P. BELDA,)
GEORGE DAVID, KENNETH T. DERR,) AFFIDAVIT OF LYNN LINCOLN
JOHN M. DEUTCH, ROBERTO) SARKO
HERNANDEZ RAMIREZ, ANDREW N.)
LIVERIS, ANN MULCAHY, RICHARD D.	
PARSONS, JUDITH RODIN, ROBERT L.)
RYAN, FRANKLIN A. THOMAS, ANN)
DIBBLE JORDAN, KLAUS KLEINFELD)
AND DUDLEY C. MECUM, and JOHN AND)
JANE DOES 1-20,)
Defendants.	

LYNN LINCOLN SARKO, an attorney duly admitted to practice in the Courts of this State of Washington, declares, pursuant to the Individual Rules and Procedures of this Court and Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, as follows:

- 2. I submit this Affidavit in support of Plaintiffs' motion for my admission to practice *pro hac vice* in this matter to argue or try this particular case in whole or in part as counsel or advocate.
- 3. As shown in the Certificate of Good Standing issued by the Supreme Court of the State of Washington and attached hereto as Exhibit 1, I am a member in good standing of the Bar of the State of Washington.
- 4. There are no pending disciplinary proceedings against me in any State or Federal court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2008, at Seattle, Washington.

LYNN LINCOLN SARKO

SUBSCRIBED AND SWORN TO before me this 9th day of January, 2008.

J. BATANAMINATION OF INTERPRETATION OF INTERPRET

Print Name: Mavis Bates

NOTARY PUBLIC in and for the State of

Washington; residing at: KiNG Co.

My commission expires:

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

) BAR NO.16569	
) CERTIFICATE OF GO)D
) STANDING	
)	
	CERTIFICATE OF GO)

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

LYNN LINCOLN SARKO

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on November 12, 1986, and is now and has continuously since that clate been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 7th day of January, 2008.

Ronald R. Carpenter Supreme Court Clerk

Washington State Supreme Court

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEPHEN GRAY, individually and on behalf of all others similarly situated, Civil Action No: 07 Civ. 9790 (SHS) Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants. SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated, Civil Action No: 07 Civ. 10294 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10, Defendants. MEREDITH TRANBERG, individually and on behalf of all others similarly situated: Civil Action No: 07 Civ. 10341 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

ANTON RAPPOLD, individually and on

behalf of all others similarly situated,

Plaintiff,

1 10

CITIGROUP INC., CITIBANK, N.A., : CHARLES PRINCE, THE PLANS : ADMINISTRATIVE COMMITTEE OF : CITIGROUP INC., THE 401(k) : INVESTMENT COMMITTEE, and JOHN : and JANE DOES 1 - 10. :

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

v.

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

Civil Action No: 07 Civ. 10396

STEPHAN FIORINO, individually and on :

behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

JAMES BOLLA, individually and on behalf: of all others similarly situated,

Plaintiff,

V.

CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

Civil Action No: 07 Civ. 10458

-----X

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR: PUERTO RICO, and all others similarly,

Plaintiff,

Civil Action No: 07 Civ. 10472

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH: RODIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, SANFORD I. WEILL,

Defendants.

ALAN STEVENS, on Behalf of Himself and All Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 11156

v.

v.

CITIGROUP INC., CITIBANK, N.A, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, PETER JOHNSON, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, FRANKLIN A. THOMAS, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., THE INVESTMENT COMMITTEE and JOHN DOES 1-30,

Defendants.

STEPHEN GOLDSTEIN, on Behalf of Himself and a Class of Persons Similarly Situated.

Plaintiff,

CITIGROUP INC., THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T.: DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. : RYAN, AND FRANKLIN A. THOMAS, And JOHN DOES 1-30,

Defendants.

CHRIS SOUTHARD, on Behalf of All

Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 11164

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

FRANCIA BRICK, individually and on Behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLAN'S ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE,: And JOHN DOES 1-10,

Defendants.

	X	
WILLIAM and PATRICIA WOODWARD individually and on Behalf of All Others Similarly Situated,), : :	
Sillinarry Situated,	•	
Plaintiffs,	:	Civil Action No: 07cv11207
V.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
ROBERT E. RUBIN, C. MICHAEL	:	
ARMSTRONG, ALAIN J. P. BELDA,	:	
GEORGE DAVID, KENNETH T. DERR,	:	
JOHN M. DEUTCH, ROBERTO	:	
HERNANDEZ RAMIREZ, ANDREW N.	:	
LIVERIS, ANN MULCAHEY, RICHARD) :	
D. PARSONS, JUDITH RODIN, ROBER	Γ:	
L. RYAN, FRANKLIN A. THOMAS, AN	N:	
DIBBLE JORDAN, KLAUS KLEINFELD) :	
AND DUDLEY C. MECUM, and JOHN	:	
and JANE DOES 1-10,	:	
	:	
Defendants.	:	

[PROPOSED] ORDER GRANTING APPLICATION OF LYNN LINCOLN SARKO FOR ADMISSION *PRO HAC VICE*

This matter coming before the Court by Motion submitted by Lynda J. Grant, seeking the admission of Lynn Lincoln Sarko to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action, and the Court having considered the Affidavit of Lynn Lincoln Sarko submitted in support thereof, and for good cause shown,

IT IS ON this	day of	, 2008,
ORDERED that:		

1. Lynn Lincoln Sarko is hereby granted admission *pro hac vice* to the United States District Court for the Southern District of New York, for the purpose of

Case 1:07-cv-09790-SHS Docum

Document 56

Filed 01/15/2008

Page 27 of 37

appearing in this action, pursuant to Rule 1.3(c) of the Local Rules of the United States

District Court for the Southern District of New York;

- 2. Lynn Lincoln Sarko is required to abide by and is subject to the Local Rules of the United States District Court for the Southern District of New York; and
- 3. Lynn Lincoln Sarko is required to notify the Court immediately of any matter that affects his standing at the Bar of any court.

United States District Judge

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

.____X **CERTIFICATE OF SERVICE** STEPHEN GRAY, individually and on behalf of all others similarly situated, Civil Action No: 07 Civ. 9790 (SHS) Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants. SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated, Civil Action No: 07 Civ. 10294 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10, Defendants. MEREDITH TRANBERG, individually and on behalf of all others similarly situated: Civil Action No: 07 Civ. 10341 Plaintiff, v. CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants.

ANTON RAPPOLD, individually and on

behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 10396

v.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN: and JANE DOES 1 - 10.

Defendants.

SAMIER TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 10442

v.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),:

Defendants.

STEPHAN FIORINO, individually and on : behalf of all others similarly situated, Civil Action No: 07 Civ. 10458 Plaintiff, v. CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20, Defendants. JAMES BOLLA, individually and on behalf: of all others similarly situated, Plaintiff, Civil Action No: 07 Civ. 10461 v. CITIGROUP INC., CITIBANK N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,

Defendants.

MARK GEROULO, individually, on behalf: of the CITIGROUP 401(k) Plan, the CITIBUILDER 401 (K) PLAN FOR PUERTO RICO, and all others similarly,

Plaintiff,

Civil Action No: 07 Civ. 10472

v.

CITIGROUP, INC., CITIBANK, N.A., THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH: RODIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, SANFORD I. WEILL,

Defendants.

IMANAGE 327666.1 11980001

ALAN STEVENS, on Behalf of Himself

and All Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 11156

v.

v.

CITIGROUP INC., CITIBANK, N.A, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, PETER JOHNSON, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, FRANKLIN A. THOMAS, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., THE INVESTMENT COMMITTEE and JOHN DOES 1-30.

Defendants.

-----X STEPHEN GOLDSTEIN, on Behalf of

Himself and a Class of Persons Similarly Situated,

Plaintiff,

CITIGROUP INC., THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T.: DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. : RYAN, AND FRANKLIN A. THOMAS, And JOHN DOES 1-30,

Defendants.

CHRIS SOUTHARD, on Behalf of All Others Similarly Situated, Civil Action No: 07 Civ. 11164 Plaintiff. v. CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, : ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. : RUBIN, ROBERT E. RUBIN, FRANKLIN: A. THOMAS, JOHN DOES 1-20 (BEING **CURRENT AND FORMER MEMBERS** OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING **CURRENT AND FORMER MEMBERS** OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),: Defendants. FRANCIA BRICK, individually and on

Behalf of all others similarly situated,

Civil Action No: 07 Civ. 11369 Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, THE PLAN'S ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE,: And JOHN DOES 1-10,

Defendants.

WILLIAM and PATRICIA WOODWARD, : individually and on Behalf of All Others :

Similarly Situated,

Plaintiffs,

Civil Action No: 07cv11207

V.

CITIGROUP INC., CHARLES PRINCE, : ROBERT E. RUBIN, C. MICHAEL : ARMSTRONG, ALAIN J. P. BELDA, : GEORGE DAVID, KENNETH T. DERR, : JOHN M. DEUTCH, ROBERTO : HERNANDEZ RAMIREZ, ANDREW N. : LIVERIS, ANN MULCAHEY, RICHARD : D. PARSONS, JUDITH RODIN, ROBERT : L. RYAN, FRANKLIN A. THOMAS, ANN: DIBBLE JORDAN, KLAUS KLEINFELD : AND DUDLEY C. MECUM, and JOHN and JANE DOES 1-10,

CERTIFICATE OF SERVICE

I, Theresa Graham, hereby certify that I am over the age of 18, and am employed by the Law Firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. On this 15th day of January, 2008, I caused true and accurante copies of the foregoing Motion to Admit Counsel *Pro Hac Vice*, Declaration of Lynda J. Grant in Support of Motions to Admit Counsel *Pro Hac Vice*, Affidavit of Lynn Lincoln Sarko in Support of Motion to Admit Counsel *Pro Hac Vice* and the Certificate of Good Standing attached thereto, and Proposed Order for Admission *Pro Hac Vice* on Written Motion, via First-Class mail, upon the following counsel of record:

Citigroup ERISA Litigation Service List

Attorneys for Defendants	Attorneys for Plaintiff Samier Tadros (07-cv-10442-SHS)
Lauranaa P. Padaysitz, Egg	(07-67-10-12 5115)
Lawrence B. Pedowitz, Esq.	Dahart I Hammad Dag
John Lynch, Esq.	Robert I. Harwood, Esq.
Bradley R. Wilson, Esq.	Jeffrey M. Norton, Esq.
WATCHELL, LIPTON, ROSEN	HARWOOD, FEFFER LLP
& KATZ LLP	488 Madison Avenue
51 West 52 nd Street	New York, New York 10022
New York, New York 10019-6150	
	Telephone: 212-935-7400
Telephone: 212-403-1000	Fax: 212-753-3630
Fax: 212-403-2000	
1 th. 212 103 2000	
Attorneys for Plaintiff Anton Rappold	Attorneys for Plaintiff James Bolla
(07-cv-10396-UA)	(07-cv-10461-UA)
Susan Salvetti, Esq.	Ann D. White, Esq.
ZWWERLING, SCHACHTER &	ANN D. WHITE LAW OFFICES P.C.
ZWERLING LLP	165 Township Line Rd, Ste. 2400
41 Madison Avenue	Jenkintown, PA 19046-3535
New York, New York 10010	John 111 170 10 3030
INCW TOLK, NEW TOLK TOUTO	Telephone: 215-481-0273
T. I. 1. 212 222 2000	1
Telephone: 212-223-3900	Fax: 215-481-0271
Fax: 212-371-5969	

Attorneys for Plaintiff Meredith Tranberg	Attorneys for Plaintiff Mark Geroulo
(07-cv-10341-UA)	(07-cv-10472-UA)
Loffray Sanira Esa	Roman Sawaf Esa
Jeffrey Squire, Esq.	Romen Sarraf, Esq. Joseph Gentile
BRAGAR WEXLER & EAGEL, PC	SARRAF GENTILE LLP
885 Third Avenue, Suite 3040	
New York, New York 10022	485 Seventh Avenue, Suite 1005
T-11	New York, New York 10018
Telephone: 212-308-5858	T-11
Fax: 212-486-0462	Telephone: 212-868-3610
	Fax: 212-918-7967
	Robert A. Izard, Esq.
	SCHATZ NOBEL IZARD P.C.
	20 Church Street, Suite 1700
	Hartford, CT 06103
	T. 1 . 1
	Telephone: 860-493-6292
	Fax: 860-493-6290
Attorneys for Plaintiff Chris Southard	Attorneys for Plaintiff Alan Stevens
(07-cv-11164)	(07-ev-11156)
Thomas I Makama Ess	Lori C. Foldman For
Thomas J. McKenna, Esq.	Lori G. Feldman, Esq.
GAINEY & MCKENNA	Arvind B. Khurana, Esq.
295 Madison Avenue, 4 th Floor	MILBERG WEISS LLP
New York, New York 10017	One Pennsylvania Plaza
	New York, New York, 10019
Telephone: 212-983-1300	
Fax: 212-983-0383	Telephone: 212-594-5300
	Fax; 212-868-1229
Attorneys for Plaintiff Stephen Gray	Attorneys for Plaintiff Steven Goldstein
(07-ev-9790-SHS)	(07-cv-11158-UA)
Marian D. Dannan E.	Educia I Milla E
Marian P. Rosner, Esq.	Edwin J. Mills, Esq.
Robert C. Finkel, Esq.	STULL, STULL & BRODY
Andrew E. Lencyk, Esq.	6 East 45 th Street
WOLF POPPER LLP	New York, New York 10017
845 Third Avenue	T. 1
New York, New York 10022	Telephone: 212-687-7230
	Fax: 212-490-2022
Telephone: 212-759-4600	
Fax: 212-486-2093	

Attorneys for Plaintiff William Woodward (07-cv-11207-UA)

Bruce F. Finaldi COHEN MILSTEIN HAUSFELD & TOLL (DC)

1100 New York Avenue, N.W., Suite 500W Washington, DC 20005

Telephone: 202-408-4600 Fax: 202-408-4699

Attorneys for Plaintiff Francia Brick (07-cv-11369-UA)

William R. Weinstein
Steven L. Wittels
Jeremy Heisler
SANFORD WITTELS & HEISLER, LLP
950 Third Avenue, 10th Floor
New York, New York 10022

Telephone: 646-723-2947 Fax: 646-723-2948

Theresa Grahan